

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEILA PORTER,

Plaintiff,

V.

ANDREA CABRAL, ET AL.,

Defendants.

CIVIL ACTION
NO. 04-11935-DPW

**MOTION FOR EXTENSION OF TIME TO SUBMIT PROPOSED MODIFICATION
OF PROTECTIVE ORDER**

Globe Newspaper Company, Inc. (the “Globe”) respectfully requests an extension of time from October 5, 2005, to Monday, October 10, 2005, to submit the proposed Modification to Protective Order as ordered by the Court on September 28, 2005. As grounds for its motion, the Globe states that it has circulated a proposed modification to the parties and requests the additional time to allow counsel to consider the Globe’s proposal. No party objects to the requested continuance.

OF COUNSEL:

David E. McCraw, Esq.
The New York Times Company
 229 West 43rd Street
 New York, NY 10036
 (212) 556-4031

GLOBE NEWSPAPER COMPANY, INC.,

By its attorneys,

/s/ Jonathan M. Albano
Jonathan M. Albano, BBO#013850
BINGHAM MCCUTCHEN LLP
150 Federal Street
Boston, MA 02110-1726
(617) 951-8000

Dated: October 5, 2005